

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

**CRIMINAL NO. 21-20721**

**vs.**

**HON. SEAN F. COX**

**D-1 TIMOTHY EDMUNDS,**

**Defendant.**

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**GOVERNMENT’S RESPONSE TO DEFENDANT’S  
MOTION TO MODIFY BOND CONDITIONS**

Despite fleeing and hiding from federal agents for six days, repeatedly lying to federal agents, intentionally avoiding electronic surveillance from a court-authorized ping warrant, a history of suicidal thoughts and violence, talk of fleeing to Mexico, and significant amounts of money still missing from his \$2 million embezzlement scheme, defendant Timothy Edmunds is unhappy with his bond conditions. Those conditions were imposed after Magistrate Judge Grey denied the government’s request for detention and generously allowed Edmunds to await trial in home detention instead of jail and pretrial detention. Judge Grey very carefully fashioned serious bond conditions given the severe risks associated with releasing Edmunds. Given the deep concerns regarding his possible flight, possible suicide,

and harassment of government witnesses, the conditions set by Judge Grey should be maintained, and the defendant's motion to modify bond should be denied.

**I. Factual Background**

**A. The Criminal Case Against Edmunds**

Edmunds had been the Financial Secretary Treasurer of UAW Local 412 between 2011 and 2021. In the summer of 2021, UAW auditors discovered that Edmunds had embezzled over \$2 million from Local 412's bank accounts over the course of the prior four years. Edmunds spent large quantities of the embezzlement proceeds on gambling, guns, cars, and women. Edmunds created fake bank statements that he gave to UAW auditors in order to conceal his fraud scheme.

On October 27, 2021, Edmunds was charged in a sealed criminal complaint with embezzlement of union funds, money laundering, and filing false union records.

On December 1, 2021, a grand jury issued an indictment charging Edmunds with embezzlement of union funds, bank fraud, and money laundering.

**B. Edmunds Successfully Evades Arrest For Six Days**

In the early morning hours of November 4, 2021, federal agents executed a search warrant at Edmunds' home in South Lyon, Michigan. The agents were also seeking to arrest Edmunds based on a warrant from the criminal complaint. Soon thereafter, Edmunds began a six-day effort to avoid capture and evade arrest. At Edmunds' home, Edmunds' fourth wife, with whom he was living alternately and

secretly with his fifth wife, provided federal agents with Edmunds' cellphone number as Edmunds had left to go to what the fourth wife believed was Edmunds' employment. A federal agent then spoke to Edmunds over the phone and informed him that they were executing a search warrant at his home, and that Edmunds needed to return to the house. Edmunds falsely told the agent that he was on the way to work, but that he would turn around and immediately return home. Of course, Edmunds never returned home, but instead proceeded to flee capture by law enforcement. Edmunds was also lying about going to work because Edmunds was no longer employed.

When Edmunds failed to return home as promised, agents texted Edmunds a copy of the arrest warrant, informed him that they were seeking his arrest on a criminal complaint, and that he needed to turn himself in immediately. Edmunds' fourth wife then informed the agents that it was her opinion, based on her conversations with Edmunds and knowledge of him, that Edmunds was going to flee prosecution and never return home.

Her prediction proved correct as Edmunds, over the next six days, proceeded to evade the efforts of thirty federal agents searching for, conducting surveillance for, and seeking to arrest him. On November 5, 2021, federal agents secured a search warrant allowing for law enforcement to ping Edmunds' phone and for a cell-site simulator in order to locate his whereabouts. However, Edmunds was sophisticated

enough in his efforts to avoid capture that he kept his cellphone turned off except when he would turn it on for very brief periods of time. By using this technique, Edmunds successfully evaded electronic detection through the search warrant.

While Edmunds was a fugitive, law enforcement made a number of attempts to apprehend him when Edmunds had briefly turned his phone on and revealed his location. However, each time, Edmunds successfully evaded arrest by quickly turning off his cell phone and leaving the area. Once in Warren, Michigan and two times in South Lyon, Michigan, law enforcement agents scrambled to find Edmunds when he turned on his cell phone to reveal his location, but Edmunds successfully fled the area and avoided capture.

A number of times during his six-day flight from arrest, federal agents spoke to Edmunds. Each time, however, Edmunds refused to reveal his location or turn himself in to authorities. Only after Edmunds retained his current legal counsel, did Edmunds finally agree to turn himself in six days after fleeing.

**C. Additional Facts Showing the Continued Risk of Flight and Non-Appearance By Edmunds**

Besides evading arrest, lying to agents, and avoiding electronic surveillance, a number of other facts indicate that Edmunds remains a significant risk of flight or non-appearance. Edmunds' fourth wife reported to law enforcement that Edmunds talked about fleeing to Mexico after the UAW auditors discovered his embezzlement

scheme over the summer of 2021. As a result, she said that Edmunds got his passport in order in preparation for this plan.

Edmunds also is a risk of flight because law enforcement has not been able to discover the proceeds of his \$2 million embezzlement. No cash was discovered in the search of Edmunds' home and no money has been seized from any account associated with Edmunds. However, agents did discover empty money wrappers in the house. Thus, Edmunds may still have access to significant amounts of money with which to flee. Similarly, casino records indicate that Edmunds took some \$90,000 in casino chips from the casino, with no indication of what Edmunds did with those chips.

During the period leading up to the execution of the search warrant at Edmunds' home, Edmunds used counter-surveillance techniques before returning to his residence with his fourth wife. Federal agents were conducting surveillance of Edmunds in the days leading to the execution of the search warrant, and Edmunds appeared to use the counter-surveillance techniques in an attempt to spot law enforcement. Edmunds also changed his phone number four times in the months after the auditors discovered his fraud, but before federal agents executed the search warrant.

While he was a fugitive, Edmunds lied to federal agents about which car he was using. Edmunds also retrieved the keys to his various cars, some of which are

still missing. During the course of his embezzlement scheme, Edmunds has purchased plane tickets in the names of other UAW members using UAW funds. He also forged the signature of the UAW Local President and created fake bank statements.

Edmunds lied to his fourth wife about being employed at the UAW Local 412 even though he had actually been suspended for months. In fact, Edmunds eventually retired from Chrysler in October 2021 and was no longer employed.

In the six months leading up to Edmunds' fugitive status, he maintained a large number of credit cards and multiple phones. Edmunds' drivers' license was suspended, but he was repeatedly driving cars during his fugitive status.

Prior to the pretrial detention hearing in this case, Edmunds refused to provide Pretrial Services with any information concerning his finances.

**D. Edmunds is Mentally Unstable and Has Threatened Suicide**

There are significant indications that Edmunds is mentally unstable and has shown repeated instances of suicidal intentions. For example, while Edmunds was a fugitive in November 2021, he called his fourth wife in the middle of the night, and he sounded suicidal over the phone to her and another witness.

In 2016, Edmunds repeatedly threatened to kill himself, and South Lyon Police took him to the hospital for treatment after Edmunds admitted that he had threatened suicide. Edmunds' girlfriend at the time was in great fear that Edmunds

was very serious about suicide that time. Before the 2016 incident, Edmunds had previously made threats of suicide.

In 2014, Edmunds was arrested for assault with a dangerous weapon for pointing a gun at a prior wife's boyfriend and pulling the trigger three times on an apparently empty gun. After this incident, Edmunds attempted to flee from the police after they were called to the house.

Edmunds' fourth wife told agents that she was happy Edmunds was not home when they executed the search warrant on November 4, 2021, because she thought that there would have been a shootout if he had been home.

Questions about Edmunds' mental stability are also raised by the fact that Edmunds was living a double life at the time federal agents attempted to arrest him. Edmunds was living with two different women at the same time over a period of six months, with both women believing that they were his lawful wife—one wife believed that Edmunds was in the process of seeking a divorce, but that they were still living together during the day. Edmunds lived with his second wife during the night, when the other wife thought Edmunds was out working at a job.

Edmunds had purchased ten firearms recently, and federal agents have not recovered all of those weapons during their search.

**E. Edmunds' Criminal History**

Unlike many white collar criminals, Edmunds has a criminal history with numerous arrests. He was found guilty of drunk driving in 2009. He then had a misdemeanor conviction for domestic violence in 2012. He was charged with assault with a dangerous weapon in 2014 in connection with the firearm incident described above. In 2014 and 2015, Edmunds was arrested twice for domestic violence, but each charge was later dismissed. In 2018 and 2019, Edmunds twice pleaded guilty to driving with a suspended license.

**F. Detention Hearing for Edmunds**

On November 15, 2021, the government sought pretrial detention in this case, and a hearing was conducted. ECF Nos. 9-11. At the conclusion of the hearing, Magistrate Judge Grey decided not to detain Edmunds, but he imposed severe bond conditions. ECF No. 12. Judge Grey decided that in spite of Edmunds' efforts to avoid arrest, the fact that Edmunds ultimately decided to turn himself in weighed sufficiently in Edmunds' favor. However, given the significant issues of risk of flight and other issues set forth above, Judge Grey ordered Edmunds into home detention with electronic monitoring. Judge Grey also ordered a financial bond be imposed as a condition.



**G. Edmunds' Conflict With His Fourth Wife**

While Edmunds was in home detention, he remained in conflict with his fourth wife over the disposition of various marital assets. At one point during Edmunds' home detention, it appears that Edmunds directed another individual to go to the fourth wife's residence and take a car, supposedly owned by Edmunds, from her using keys supplied by Edmunds. The electronic monitoring established that Edmunds himself did not go to the home of his fourth wife, but this incident does show that if Edmunds does not remain in home detention, then he poses an increased danger of confronting his fourth wife.

**H. Edmunds' Motion to Modify Bond Conditions**

Edmunds has filed the instant motion to modify his bond conditions. Edmunds asks to remove location monitoring or allow him to be placed on standalone monitoring instead of home detention. Edmunds claims that he has obtained several new employment opportunities that cannot be completed with home confinement.

**II. Edmunds' Motion Should Be Denied**

Based on Edmunds' conduct and history, he remains a significant risk of flight. He is lucky that he is not in pretrial detention given his six-day flight from law enforcement, his mental instability and suicidal statements, his criminal history, and his contemplation of flight to Mexico. While counsel raises the possibility of

other “employment opportunities” that cannot be completed with his current home detention condition, these opportunities are not described or identified. It is unclear what employer would even desire to hire a \$2 million fraudster with Edmunds’ significant other problems.

Magistrate Judge Grey imposed home detention in this case because of the significant risk of flight. Mere compliance with his conditions of bond for three months does not support removing the home detention condition. This is especially true where Edmunds has threatened suicide, may have access to firearms, has a history of domestic violence, and has been in conflict with his fourth wife.

The danger of reducing his bond conditions is simply too much to risk.

Respectfully submitted,

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DATED: February 25, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Joseph Arnone, Esq.

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